

DOCKET NOS. 16226, 16285, 17579, 17587, 17781, and 19000

**ORDER APPROVING IMPLEMENTATION SCHEDULE AND
ESTABLISHING DOCKET NO. 19000
REGARDING IMPLEMENTATION ISSUES**

PUC DOCKET NO. 16226

**PETITION OF AT&T
COMMUNICATIONS OF THE
SOUTHWEST, INC. FOR
COMPULSORY ARBITRATION TO
ESTABLISH AN INTERCONNECTION
AGREEMENT BETWEEN AT&T AND
SOUTHWESTERN BELL TELEPHONE
COMPANY**

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**PUBLIC UTILITY COMMISSION

OF TEXAS**

PUC DOCKET NO. 16285

**PETITION OF MCI
TELECOMMUNICATIONS
CORPORATION AND MCIMETRO
ACCESS TRANSMISSION SERVICES,
INC., FOR ARBITRATION PURSUANT TO
SECTION 252(b) OF THE
TELECOMMUNICATIONS ACT OF 1996**

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**PUBLIC UTILITY COMMISSION

OF TEXAS**

PUC DOCKET NO. 17579

**APPLICATION OF AT&T
COMMUNICATIONS OF THE
SOUTHWEST, INC. FOR
COMPULSORY ARBITRATION OF
FURTHER ISSUES TO ESTABLISH AN
INTERCONNECTION AGREEMENT
BETWEEN AT&T AND
SOUTHWESTERN BELL TELEPHONE
COMPANY**

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**PUBLIC UTILITY COMMISSION

OF TEXAS**

PUC DOCKET NO. 17587

REQUEST OF MCI	§	
TELECOMMUNICATIONS	§	
CORPORATION AND ITS AFFILIATE,	§	PUBLIC UTILITY COMMISSION
MCIMETRO ACCESS TRANSMISSION	§	
SERVICES, INC. FOR CONTINUING	§	
ARBITRATION OF CERTAIN	§	OF TEXAS
UNRESOLVED PROVISIONS OF THE	§	
INTERCONNECTION AGREEMENT	§	
BETWEEN MCIM AND	§	
SOUTHWESTERN BELL TELEPHONE	§	
COMPANY	§	

PUC DOCKET NO. 17781

COMPLAINT OF MCI AGAINST SWB	§	
FOR VIOLATION OF COMMISSION	§	PUBLIC UTILITY COMMISSION
ORDER IN DOCKET NO. 16285	§	
REGARDING CABS ORDERING AND	§	OF TEXAS
BILLING PROCESSING	§	

PUC DOCKET NO. 19000

RELATING TO THE	§	PUBLIC UTILITY COMMISSION
IMPLEMENTATION OF SWBT'S	§	
INTERCONNECTION AGREEMENTS	§	OF TEXAS
WITH AT&T AND MCI	§	

**ORDER APPROVING IMPLEMENTATION SCHEDULE AND
ESTABLISHING DOCKET NO. 19000
REGARDING IMPLEMENTATION ISSUES**

A. Order Approving Implementation Schedule

In the orders approving the amendments to the interconnection agreements between Southwestern Bell Telephone Company (SWBT) and AT&T Communications of the Southwest, Inc. (AT&T) and MCI Telecommunications Corporation and its Affiliate, MCIMetro Access Transmission Services, Inc. (MCI), issued on February 27, 1998 and February 28, 1998 respectively, the Commission contemplated issuing a supplemental order approving a comprehensive implementation schedule. The Commission hereby approves the comprehensive implementation schedule, attached hereto as Attachment A. This schedule creates a number of milestone requirements and dates for implementation for both the AT&T and MCI interconnection agreements with SWBT. Moreover, the schedule contains a number of check-in dates to review and enforce compliance with the schedule and requires a weekly conference call to update staff on developments, areas of dispute, and anticipated compliance concerns.

B. Delegation to Staff

The Commission hereby delegates to staff the authority to resolve disputes relating to the implementation schedule, including conducting evidentiary hearings where required. Staff may modify the implementation schedule as appropriate. Staff shall report to the Commission any substantive rulings made in this docket regarding implementation issues.

C. Establishing Implementation Docket

To comprehensively address issues relating to the implementation of these interconnection agreements, the Commission establishes Docket No. 19000, *Relating to the Implementation of SWBT's Interconnection Agreements with AT&T and MCI*. All future filings relating to any issue addressed in the implementation schedule shall be filed

in Docket No. 19000, in accordance with the filing requirements in P.U.C. PROC. R.
§ 22.72.¹

SIGNED AT AUSTIN, TEXAS the _____ day of March 1998.

PUBLIC UTILITY COMMISSION OF TEXAS

PAT WOOD, III, CHAIRMAN

JUDY WALSH, COMMISSIONER

PATRICIA A. CURRAN, COMMISSIONER

¹ For parties in the mega-arb, other than AT&T and MCI, with unresolved issues that will be addressed in conjunction with Docket No. 19000, *e.g.* virtual collocation, those parties shall file pleadings in their respective docket as well as Docket No. 19000. Pleadings relating to implementation issues shall not be filed in Docket Nos. 16189, 16226, 17579, 17585, or 17781.

ATTACHMENT A

Implementation Issues

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
	Staff check-in's					5/5/98 6/19/98 8/24/98 10/1/98 A Weekly Conference Call , starting on 3/23/97 at 10:00am and Add'l dates, as necessary
	Pre-Ordering					
1.	Datagate Verigate	Due Date/Dispatch: Ready for testing	3/1/98 (SWBT's comments to MCI EDI comment are in 4a.)	3/1/98	MCI agrees that 3/1/98 is a reasonable availability date for "Due Date" and "Dispatch" functionality to be provided in Verigate and DataGate. MCI agrees that availability of these functions with in Verigate and Datagate is an interim solution. MCI understands that SWBT will develop this capability in their EDI interface concurrent with industry standards. At this time Due Date and Dispatch functionality is targeted for EDI version 10.0/LSOG 4.	3/1/98 as previously ordered for Datagate and Verigate. This functionality will be incorporated in EDI pursuant to the EDI development dates.
		Due Date/Dispatch: AT&T/MCI complete actual testing	3/16/98	3/16/98	MCI has access to Verigate and agrees that testing of due date and dispatch functionality can be completed by 3/16/98 if SWBT provides the capability by 3/1/98. MCI does not have access to DataGate and would not be able to test this application in the time frames specified.	3/16/98
		Completion of reasonable modification. i.e. Correct any problems resulting from tests or estimate date if longer period of time required	3/31/98	3/31/98	MCI agrees that two weeks from the time of completion of testing is sufficient for SWBT to implement reasonable modifications to Verigate or DataGate identified during test processes.	3/31/98
		8db v IDLC: SWBT will check to determine if	3/1/98 SWBT has already checked and this capability is not in EASE for	3/1/98 Should SWBT determine that the	MCI agrees that SWBT could make a determination of the capability of	Completed

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		there is a capability in EASE to ID customer served by IDLC.	resale. SWBT is not required to provide this capability in EASE for resale, as it is in parity with retail service. Since EASE only supports Resale, it makes no difference on the pre-order basis if a customer is served by IDLC. Maint. & Repair functions for IDLC are detailed in the 2/19 letter.	functionality is not inherent in EASE then, by 3/1/98 SWBT should provide a date when this capability will be provided.	EASE by 3/1/98. However, merely making a determination of the capability is insufficient by itself. Should SWBT determine that the functionality is not inherent in EASE then, by 3/1/98 SWBT should provide a date when this capability will be provided	Parity exists since neither SWBT using EASE nor competitors have this capability electronically for resale.
2.	CSRs length	SWBT & MCI/AT&T meet to discuss whether CSR is at parity	2/23/98	2/23/98 AT&T requests a copy of the same materials to be provided to MCI.	Brian Loewen took the action item to coordinate a meeting for 2/23/98. MCI agrees that this date is acceptable for the meeting. MCI requests that SWBT provide (to ATT/MCI) documentation of business rules or training materials used to train its service representatives on the retrieval CSRs at least two days prior to the meeting.	Completed on 2/23/98
		Joint Report to Comm.	3/4/98	3/4/98	MCI agrees that it will endeavor to draft a joint report outlining its concurrence with SWBT if a determination is made that parity for CSR retrieval exists. In the alternative, if it is determined that parity for CSR retrieval does not exist MCI will file a joint report outlining discrepancies and action plans and time lines for SWBT to bring CLEC CSR retrieval into parity.	AT&T/MCI; report filed on 3/4/98. Staff meeting with SWBT/AT&T/MCI to be held at SWBT's office for a demonstration, if necessary, no later than 4/8/98. Staff to issue an order on further implementation concerning what steps, if any, SWBT must implement to create parity access. This meeting would help determine whether SWBT has similar restrictions that CLECs are facing and whether a SORD report should be available on line.
3.	Datagate Implementation	Training: a) SWBT provide curriculum to MCI b) Training Request by MCI c) MCI attend training Technical Specifications: a) MCI Identify any further tech specs needed. b) MCI identify what interface it will use w/prioritized list of	a) 2/17 Provided 2/13/98. On Nov. 12, 1997 SWBT provided Access Reference Guide which contains the technical specs. for Datagate application which includes field descriptions, record layouts, data dictionary, etc. b) 2/20 The statements regarding PacBell's provision of DataGate information is misleading because this documentation is nearly identical to the documentation SWBT provided to MCI in November 1997. During the	N/A	a) SWBT provided the curriculum to MCI on 2/13/98. MCI would note that the November 12, 1997 reference guide that SWBT refers to is merely a cursory listing of Datagate's features. It contains nowhere near the detail that PacBell's documentation included (see below) and does not provide sufficient detail for MCI to develop its interface. b) MCI has agreed to provide an indication of its desire to attend	Curriculum provided to MCI on 2/13/98. Special Datagate training class to be held prior to 4/7/98 unless MCI and SWBT agree otherwise. MCI to specify any further technical specifications needed within one week of training. MCI to identify the pre-order interfaces it intends to use no later than 3 weeks after the training. The generic list

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		order types	<p>working session, MCI understood and agreed that it would not receive the course material until attending the class. SWBT is still willing to expedite the scheduling of the class. This internal and external policy to not provide this documentation before the class serves to focus SWBT technical resources to effectively answer programming questions. To be consistent with other CLECs, SWBT expects to receive MCI training request on 2/20 so to schedule this class and provide additional documentation.</p> <p>c) 1st avail. training after 2/27</p> <p>a) no later than 1 week after training class</p> <p>b) no later than 3 weeks after training class.</p>		<p>DataGate training following review of the curriculum. However, since this agreement was made in the implementation workshop MCI has received from SWBT's sister company (PacBell) the technical specifications for PacBell's DataGate application. This documentation contains field descriptions, record layouts, data dictionary etc. MCI was not required to attend training sessions by PacBell's Account Management team as a requisite to receipt of the documentation. MCI desires to ascertain whether DataGate is an appropriate Pre-order application to MCI's needs. By 2/17/98 MCI believes SWBT should communicate whether PacBell's DataGate application is materially different than SWBT's DataGate application and why SWBT poses more onerous conditions on MCI for OSS access than PacBell does. MCI feels that SWBT should agree to provide its DataGate specifications to MCI by 2/17/98. MCI commits to provide an indication of its desire to attend DataGate training within five days following receipt of SWBT's technical specifications.</p> <p>c) MCI accepts SWBT's offer to schedule a special DataGate training class in St. Louis, MO that accommodates the dates provided by MCI for such training. MCI will provide these requested dates no later than five days following receipt of the technical specifications</p> <p>a) If MCI should take the DataGate training class it agrees to identify any further technical specs needed from SWBT.</p> <p>b) MCI agrees to identify the pre-order interfaces (s) it intends to use no later than 3 weeks after attending the training class. MCI agrees to provide a generic list of order types that will realistically be</p>	provided by MCI, while not an official projection of use, should provide SWBT with sufficient information to prioritize the development of pre-order interfaces.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
					subject to SWBT's pre-order environments. SWBT acknowledges that MCI may opt to utilize several pre-order applications Verigate, DataGate, and EDI. Additionally SWBT acknowledges that MCI's generic indication of order types is intended to provide an indication of activity in general but, MCI's generic list will not constitute a projection of order volumes by end office or any other physical, technical or, geographical entity. MCI commits to volumes of order activity within the realm of volumes committed to in the Interconnection Agreement.	
4a.	EDI/CORB A	Set up meeting to begin discussions on plans/intentions for implementation of Real-Time Pre-Ordering Electronic Bonding	3/25 SWBT will make its preordering functions available via the ECIC recommended preordering format, within 120 days from the date of final closure or as mutually agreed by the parties, in compliance with the Interconnection Agreements.	Allow Change Control process (4b) to cover this issue.	Allow Change Control process (4b) to cover this issue.	See 4(b) below.
4b.	EDI/CORB A Change Control (New Release Administration)	SWBT-wide change control process to be developed prior to national standards: a) Parties exchange drafts b) Conf. call to discuss c) Reach agreement on Change Control process	a) 2/20 b) 2/26 SWBT is approaching the SWBT Change Control Process on a consistent 7 state basis with its Pacific Bell and Nevada Bell affiliates. However, to clarify SWBT interfaces are independent of Pacific Bell interfaces and serve its 5 states. The industry guidelines will enable MCI, SWBT, Pacific Bell and Nevada Bell to contribute to the national process that will support changes to the industry guidelines. c) 4/30/98	a) 2/20 b) 2/26 c) 3/16 The next OBF release, LSOG3, is due in late March, 1998. The Change Control process by which those changes will be implemented should be in place prior to that release.	MCI agrees that SWBT should consider national guidelines in the development of a Change Management process. MCI further agrees that at a minimum SWBT will implement a joint Change Management process that covers SBC's entire serving area (i.e. SWBT & PacBell). a) MCI agrees to exchange draft Change Management plans with ATT and SWBT by 2/20/98. b) MCI agrees to participate in a joint conference call coordinated by SWBT, on 2/26/98. MCI agrees that the intent of this call is to establish a strategy for pursuit of a joint MCI/ATT/SWBT Change Management process. MCI proposes April 30, 1998 as a completion date for implementation	a) Parties exchange drafts for change control process by 2/20/98. b) Follow-up conference call on 2/26/98. c) 3/16/98 to complete implementation of the change control process.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
					of this joint process between the parties.	
5.	Pre-ordering Resale	SWBT to provide indication of 3 rd party inside wire a) EASE b) Toolbar - Repair/Maintenance Verigate/Datagate	a) 3/98 b) Repair/Maintenance - 3/98 Verigate/Datagate - 4/17/98	a) 3/31/98 b) 3/31/98	MCI agrees that SWBT should provide an indication of 3 rd party inside wire arrangements as part of all it's pre-order applications. MCI proposes that this functionality be provided in DataGate and Verigate by 3/31/98	a) 3/31/98 b) 3/31/98
6.	CLLI Code Info. after permanent number portability	New Release Administration (SR-Meeting)	There is no requirement to provide this information, however SWBT to meet by 3/30/98 to discuss LNP impacts and requirements.	AT&T and MCI agree that SWBT should be required to provide CLLI codes in all pre-order applications as soon as ILNP and/or LNP is available. AT&T and MCI propose that this capability be made available by 3/30/98 in Verigate and DataGate. AT&T and MCI further propose that SWBT make CILLI code available in EDI as soon as the OBF standardizes the functionality.	MCI believes that SWBT should provide CLLI codes in all pre-order applications as soon as ILNP and/or LNP is available. MCI proposes that this capability be made available by 3/30/98 in Verigate and DataGate. MCI further proposes that SWBT make CILLI code available in EDI as soon as the OBF standardizes the functionality.	Parties to meet by 3/27/98 concerning the provision of CLLI Code Information after permanent number portability. Staff follow-up on this issue can take place during the staff check-in planned prior to May 5, 1998.
	Ordering					
7.	EASE for UNE's	AT&T provide tech explanation on modifications of EASE and develop timeline.	2/16/98 See SWBT filed comments for Ease for UNE schedule. AT&T chose to include their schedule here and not in their filed comments.	2/16/98	SWBT should provide to MCI a copy of the technical explanation.	AT&T and SWBT to meet to discuss implementation of AT&T's proposed modifications (1FU USOC method) by March 18, 1998.
	EASE for loop and switch port combinations / implementation timeline.					AT&T remains obligated to provide the specific data, e.g. CLLI codes, for each unbundled element ordered. Because EASE, as modified herein, will not receive this information, AT&T may provide this information on a post-hoc, aggregated basis. AT&T shall provide a data tape or disk to SWBT on a monthly basis that uniquely identifies AT&T's customer telephone number and lists all information required by the Arbitrators' awards / interconnection agreement. AT&T and SWBT shall discuss the formatting of this data during the EASE development. AT&T shall also maintain this information in case SWBT requires a resubmittal once EDI becomes fully operational. If requested, AT&T shall assist SWBT in a search for

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
						programmers with the necessary background and experience.
	a) SWBT to identify USOC for POTS UNE loop with port	On the Line Selection screen, create a USOC that identifies loop and port combinations – (LPC). On the FID Assignment Screen, a FID would be assigned to direct the switch to begin recording usage.		April 1, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for AT&T's rationale.		No later than April 22, 1998
		EASE will flow through order to SORD and continue to utilize existing POTS process for provisioning loop with port orders (EASE development for Designed or special services is not necessary since this will only be for POTS UNE loop with port)				No later than April 22, 1998
	b) Determine billing for AT&T loop with port.	Add loop and port monthly recurring charges to CRIS (usage today already is provided through CRIS) (As SWBT indicated, billing for UNEs in the interim will not be a mechanized CABS bill, but rather, a combination of CRIS and paper bills. Therefore, AT&T will accept CRIS bill during the interim utilization of EASE for loop and port.)		May 1, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for AT&T's rationale		No later than 30 days after the milestones in 7(a) above are met.
	c) Test EASE provisioning of UNE loop with port using existing back-end systems	Provide Record of Understanding to SWBT and work through testing processes of EASE		May 1, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for AT&T's rationale		No later than 30 days after the milestones in 7(a) above are met.
		AT&T to develop and deploy methods and procedures and training		June 1, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for		No later than 30 days after the milestone in 7(b) above is met.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		to its testing service representatives		AT&T's rationale		
		90 day Systems readiness test		June 1, 1998 – August 15, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for AT&T's rationale		A seventy (70) day testing period is approved, which can be extended to ninety (90) days by mutual consent of SWBT and AT&T. The testing period shall begin 30 days after the milestone in 7(b) above is met.
	Phase-out of EASE for UNEs					12/24/98 to be about ten weeks after the EDI "live" commercial date contained in this schedule. One week after EDI begins taking "live" commercial orders, AT&T shall begin ordering at least 10% of these orders on SWBT's EDI interface, after four weeks - 25%, after seven weeks 50%, after 9 weeks 75%, and by 12/24/98 (approx 10 weeks) 100% of these orders should be presented through the EDI interface. A 10/1/98 check-in will take place to review EDI development and EASE performance.
		SWBT meets performance measurements for UNE-loop and port consistent with Attachment 17		August 15, 1998 See attached "AT&T's Proposed Implementation Schedule-EASE" for AT&T's rationale		The day immediately following the completion of testing.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision																											
8.	LEX	a) SWBT provide flow through capability for Phase I b) AT&T to begin testing c) AT&T to provide commitment as to using beyond testing d) AT&T complete testing e) <u>AT&T/SWBT review meeting</u>	a) 4/30/98 Phase I flow through to include 8db loop with analog switch port combinations. b) 3/3/98 c) 6/7/98 d) 5/31/98 Commitment made by AT&T on 2/10/98 e) 5/7/98 <u>AT&T Implementation Timeline for LEX for UNE</u> <table><tr><td>Event Description</td><td>Start Date</td><td>CompDate</td></tr><tr><td>Initial Coordination Meeting</td><td>10/97</td><td></td></tr><tr><td>AT&T Record of Understanding</td><td>2/9/98</td><td>3/3/98</td></tr><tr><td>Prerequisites Met</td><td>Completed</td><td></td></tr><tr><td>Pre-Implement Coord Mtg(s)</td><td>2/10/98</td><td>6/3/98</td></tr><tr><td>Trial Process Plan</td><td>Completed</td><td>2-10-98</td></tr><tr><td>Establ. & Confirm Connectivity</td><td>Completed</td><td></td></tr><tr><td>Eval./Testing Process</td><td>3/3/98</td><td>5-31-98</td></tr><tr><td>Implement. Commitment Date</td><td>6/7/98</td><td></td></tr></table>	Event Description	Start Date	CompDate	Initial Coordination Meeting	10/97		AT&T Record of Understanding	2/9/98	3/3/98	Prerequisites Met	Completed		Pre-Implement Coord Mtg(s)	2/10/98	6/3/98	Trial Process Plan	Completed	2-10-98	Establ. & Confirm Connectivity	Completed		Eval./Testing Process	3/3/98	5-31-98	Implement. Commitment Date	6/7/98		a) 4/30/98 b) 3/3/98 c) 6/7/98 d) 6/7/98 e) 5/7/98 Meeting to discuss Phase II flow through Based on milestones (a)-(e), SWBT's "AT&T's Implementation Timeline for LEX for UNE" is unnecessary and will cause confusion if separately ordered.		a) 4/30/98 b) 3/3/98 c) 6/7/98 d) 6/7/98 e) 5/7/98 Meeting to discuss Phase II flow through 6/1598 Live" Commercial Begin Performance Measures on 6/1/598
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		SWBT to provide job aide for CLEC to create circuit ID	2/25/98 A database does not exist to provide circuit Ids. The Circuit ID is based on the Telephone Number or on individual facility information. The job aid will allow a CLEC to create the circuit ID just as the SWBT LSC creates one.	CLECs need a copy of the job aid but, also access to inventory database to retrieve circuit Ids instead of having to call the LSC. CLECs propose a 3/15/98 date for this access	CLECs need a copy of the job aid and also access to inventory database to retrieve circuit Ids instead of having to call the LSC. MCI proposes a 3/15/98 date for this access	SWBT to provide the job aide to assist CLECs create a circuit ID by 2/25/98. If AT&T/MCI believe the job aide is inadequate after their review, they can request that the access to inventory database issue be discussed at the 5/5/98 staff check-in.																											
		SWBT make available change activity multi-line (Phase II) a) <i>SWBT Status Report 3/15/98</i> b) <i>Completion of capabilities</i>	SWBT Status Report 3/15/98. Phase I will be completed 4/30/98 as indicated in item 8 (LEX) above. Phase II is contingent upon completion of Phase I.	a) 3/15/98 b) 8/31/98 AT&T agrees with the status report requirement, but a completion date is necessary. August 31 provides sufficient time to complete Phase II capabilities, based on SWBT's proposed Phase I timeline.	MCI agrees that SWBT should make MACD activity available electronically for multi-line customers by the beginning of Phase II, on or around February 23, 1998.	Status report on 3/15/98. Completion of capabilities by 6/15/98.																											

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
9.	EDI	SWBT/AT&T analysis of EDI & true-up differences	2/18/98 This date is for SWBT to provide differences for Resale and INP. A subsequent meeting is necessary to discuss the Gap analysis as indicated below.	<p>AT&T has committed to developing a long-term EDI solution and has allocated \$30 Million to develop a regional EDI solution compatible with SWBT's systems and consistent with the ordering requirements imposed by the Commission's most recent orders in this proceeding. Comprehensive implementation and testing of this long-term UNE EDI platform, which includes the following major capabilities, is required:</p> <ul style="list-style-type: none"> • pre-ordering • ordering • provisioning • repair/maintenance • billing • production volumes with flow through <p>The milestones described in the SWBT/AT&T Exclusive Section below are necessary to provide for comprehensive implementation and testing of the UNE EDI platform.</p>		<p>SWBT to provide differences for resale and INP by 2/18/98</p> <p>Gap analysis meeting shall take place prior to 3/23/98.</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision																																																																																																																																																
10.		Insert Milestones from SWBT document provided at 2/12/98 work session.	<p><u>SWBT/AT&T Implementation Timeline for EDI</u></p> <p>See attached EDI Implementation Timelines for details.</p> <table><thead><tr><th>Event Description</th><th>Start Date</th><th>CompDate</th></tr></thead><tbody><tr><td colspan="3">Milestones for UNE EDI Ordering:</td></tr><tr><td>Initial Coordination Meeting</td><td>2/16/98</td><td>2/27/98</td></tr><tr><td>AT&T UNE EDI/LSR Analysis</td><td></td><td>2/18/98</td></tr><tr><td>SWBT Resale EDI/LSR/INP Anal</td><td></td><td>2/18/98</td></tr><tr><td>Exchange Change Control ideas</td><td></td><td>2/20/98</td></tr><tr><td>SWBT Establishes Chg Control</td><td></td><td>2/26/98</td></tr><tr><td>Conclude LSOR2 UNE/Resale Anal.</td><td></td><td>2/27/98</td></tr><tr><td>AT&T Record of Understanding</td><td>2/18/98</td><td>3/6/98</td></tr><tr><td>Prerequisites Met</td><td>2/16/98</td><td>3/6/98</td></tr><tr><td>Pre-Implement Coord Mtg(s)</td><td>2/16/98</td><td>3/6/98</td></tr><tr><td>UNE Trial Process Plan</td><td>2/16/98</td><td>3/6/98</td></tr><tr><td>Establ. & Confirm Connectivity</td><td>3/97</td><td>3/8/98</td></tr><tr><td>Eval./Testing Process</td><td>3/9/98</td><td>6/8/98</td></tr><tr><td>Implement. 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MCI agrees with the majority of SWBT's milestones and dates. However, MCI notes several notable omissions and/or unrealistic dates. SWBT did not include a date for the completion of Phase 2 testing. Indeed, MCI has been unable to commence Phase 2 testing since MCI's tests have highlighted numerous problems with SWBT's EDI system (e.g., SWBT did not return order confirmations (SOCs) for several recent test orders). The commencement of Phase 3 (production) testing is dependent on the completion of Phase 2 testing since MCI cannot risk the use of actual customers until all of the system problems are worked out. Moreover, MCI will require additional development time to complete its EDI development (i.e., fourth quarter 1998, if MCI is able to promptly proceed to Phase 2 testing).	<p>SWBT/AT&T implementation time line for EDI is contained in the following sections.</p> <p><u>SWBT/MCI Implementation Timeline for EDI:</u></p> <table><thead><tr><th>Event Description</th><th>Start Date</th><th>CompDate</th></tr></thead><tbody><tr><td colspan="3">Milestones for Resale and UNE EDI Ordering:</td></tr><tr><td>Initial Coordination Meeting</td><td>12/3/97</td><td></td></tr><tr><td>MCI Record of Understanding</td><td>12/12/97</td><td>12/22/97</td></tr><tr><td>Prerequisites Met</td><td>12/3/97</td><td>12/12/97</td></tr><tr><td>Pre-Implement Coord Mtg(s)</td><td>12/3/97</td><td>12/19/97</td></tr><tr><td>Trial Process Plan</td><td></td><td>Incorporated Into ROU</td></tr><tr><td>Establ. & Confirm Connectivity</td><td>9/5/97</td><td>12/19/97</td></tr><tr><td>Phase 1 Eval./Testing Process</td><td>12/19/97</td><td>est.2/16</td></tr><tr><td>"Phase 2" Implement. 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AT&T / SWBT Exclusive Section relating to Implementation Timeline						
	EDI -- Determination of Gaps between what was negotiated and implemented by each party	a) AT&T provide SWBT with UNE EDI /LSR analysis b) SWBT provide AT&T with Resale and INP EDI/LSR Analysis c) Meet with SWBT to discuss the gap analysis and understand how SWBT implemented LSOR2 as compared to what has been negotiated d) Reach agreement on EDI interface requirements based on LSOR2	a) 2/18/98 b) 2/18/98 c) 2/27/98 d) 2/27/98 Conclude description of SWBT's requirements for LSORG2. AT&T and SWBT should be able to reach agreement on SWBT's interface requirements by the end of February. This goal is possible now that AT&T modified its approach for EDI development to recognize differences between ILECs, instead of insisting all ILECs change their systems to do it AT&T's way for all carriers. AT&T's new OSS strategy should no longer stand in the way of their EDI implementation.	Completed: a) 2/18/98 b) 2/18/98 c) 2/27/98 d) 3/16/98 March 16 date matches up with development Change Control process identified in next milestone		Completed: a) 2/18/98 b) 2/18/98 c) 2/27/98 d) 3/16/98 March 16, 1998 date matches up with development Change Control process identified 4(b) as well as then next milestone
	EDI -- Implementation Change Control	a) AT&T/MCI/SWBT exchange their proposal for Change Control process b) AT&T/MCI/SWBT meet discuss their proposal regarding Change Control Process c) AT&T/MCI/SWBT to reach agreement on a change control process for implementation of changes to support changes going forward.	a) 2/20/98 b) 2/26/98 c) 3/2/98 SWBT has produced, and will take comments on, its EDI change control process prior to the OBF developing a guideline. The key issue will be providing the right amount of advance notification of new SWBT requirements based upon emerging guidelines and the need to reduce errors and increase flow through. To clarify, SWBT's EDI interface requirements are based upon current, yet evolving OBF guidelines. Change control will be a constant factor. SWBT fits its ordering requirements into the mold (forms) of the OBF guidelines. SWBT has one (1) EDI interface and must issue only one set of requirements for carriers to order its products. While SWBT works with all carriers to accommodate desired operations, SWBT has the final say over its requirements per OBF rules and the Texas Commission.	Completed: a) 2/20/98 b) 2/26/98 c) 3/16/98 AT&T and SWBT initially negotiated business rules and coding requirements based on LSORI. Without additional negotiations, SWBT unilaterally made changes to their side of the interface. The agreed gap analysis described in the preceding milestone is necessary to provide for updated business rules and coding requirements as of this date. A change control process is necessary to implement changes required by OBF's LSOG3, expected in late March, and subsequent OBF releases. AT&T will include LSOG3 and subsequent releases in its system development going forward.	See MCI's discussion on 4b.	a) 2/20/98 b) 2/26/98 c) 3/16/98
	EDI -- Determination of Requirements	a) AT&T to determine development requirements to meet "ordering with specificity" and LSOR2	a) SWBT ready to provide clarification now b) Unclear, SWBT ready to provide clarification now. Note: AT&T's dates do not	Completed: a) 4/15/98 AT&T will need 30 days after agreement is reached on LSOR2 requirements on 3/16/98 (see above) to determine the		a) 4/1/98 b) 4/15/98 AT&T is provided with two weeks

Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
	requirements b) Complete a joint AT&T/SWBT EDI Mapping Matrix for LSOR2.	accommodate the pace of the industry and no carrier can lag behind the industry guidelines. AT&T proposes completion of LSOR2 review 60 days after OBF is expected to issue LSOR3.	scope of the software development to AT&T's front end systems necessary as a result of those requirements. b) 5/15/98 AT&T and SWBT will jointly map the data elements to be exchanged via the EDI Gateway to SWBT. The change control process will allow LSOG3 requirements to be worked concurrently.		for these steps rather than its requested 30 days.
EDI -- Determine systems development time required (AT&T)	a) Prepare systems design and specifications to support modifications and new requirements to EDI interface	Time frames proposed do not keep pace with industry.	Completed: a) 6/15/98 Once the scope of software development and EDI data elements are established, AT&T needs 30 days to prepare and provides documentation to software developers to enable them to write software per internal AT&T systems, e.g., update screens and create databases, to write software for AT&T's side of the EDI interface.		a) 5/1/98 AT&T is provided with 16 days for this step rather than its requested 30 days.
EDI -- AT&T to code and develop to system requirements	a) System programmers to code and develop comprehensive system b) Internal testing to ensure code has been developed to specifications	Time frames would need to consider LSOG3 at minimum, perhaps LSOG 4 due out Fall of 1998. Clearly, AT&T needs to re-evaluate if it can accommodate today's pace of industry based ordering development.	Completed: a) 10/15/98 4 months are required to complete development of software and database changes defined in above milestone. b) completed 12/31/98 Prior to joint testing with SWBT, AT&T needs 8 weeks of internal testing and 2 additional weeks to make modifications as determined from testing		a) 7/1/98 AT&T is provided with two months for this step rather than its requested four months. b) 9/1/98 AT&T is provided with the 8 weeks for this step rather than its requested 10 weeks.
EDI -- Flow Through Development for SWBT	a) Phase 1: Flow through capability b) Meeting to determine flow through schedule for Phase 2 c) Phase 2: Flow through capability d) Phase 3: Flow through capability	a) 4/30/98 b,c,d) SWBT to provide status on 3/15/98 for Phase 2 and 3.	Completed: a) 4/30/98 b) 5/7/98 c) 8/31/98 d) 12/31/98 Flow through is essential to supporting a commercially viable competitive marketplace		a)4/1/98 b) 4/15/98 c) 6/15/98 d) 9/1/98
UNE billing	a) long term billing arrangements as outlined in the billing milestones must be complete to support comprehensive testing.	See billing implementation schedules	Completed: a) 12/31/98 Current SWBT schedule is to provide electronic billing by 3/99, AT&T requires SWBT to provide electronic billing to AT&T to test end-to-end capabilities using EDI platform consistent with testing schedule outlined below.		See Following specific issues relating to UNE billing.
AT&T/	a) AT&T to update	a) AT&T Rec of Und 2/18/98 3/6/98	The following milestones are agreed.		a) AT&T Rec of Und 2/18/98 3/20/98

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
	SWBT comprehensive testing	Record of Understanding (ROU) to include UNE requirements and provide to SWBT b) Prerequisites Met a) Pre-Implementation Coordination Meeting d) Trial Process Plan e) Reaffirm Connectivity f) OSS Evaluation /Testing process including all UNE processes (billing, performance measurements, etc.) g) Implementation Date h) Begin Processing "Live" transactions i) Begin Live Performance Measurements Publication	b) Prerequisites Met 2/16/98 3/6/98 c) Pre-Impl. Coord Mtg(s) 2/16/98 3/6/98 d) UNE Trial Proc Plan 2/16/98 3/6/98 e) Estab. & Conf Conny 3/97 3/8/98 f) Eval./Testing Process 3/9/98 6/8/98 g) Implement. Start Date 6/8/98 N/A h) "Live" Commercial 6/9/98 N/A i) Begin Perf. Measures 6/15/98 (May Data)	However, the complete date for these milestones cannot occur until after the development process outlined above for AT&T and SWBT is completed: a) 12/15/98 b) 1/5/99 prerequisites include AT&T's requirements plus billing and flow through implementation for comprehensive testing c) 12/15/98 d) 1/5/99 e) 12/15/98 f) 1/5/99 – 3/31/99 (90-day testing) g) 4/1/99 h) 4/1/99 i) 5/1/99		b) Prerequisites Met 2/16/98 3/20/98 c) Pre-Impl. Coord Mtg(s) 2/16/98 3/20/98 d) UNE Trial Proc Plan 2/16/98 4/6/98 e) Estab. & Conf Conny 3/97 4/13/98 f) Eval./Testing Process 4/13/98 7/12/98 g) Implement. Start Date 10/1/98 N/A h) "Live" Commercial 10/15/98 N/A i) Begin Perf. Measures 10/15/98 (Sept. Data)
11.	MLT	Incorporate MLT capability into UNE interfaces	12/31/97	AT&T will test this capability during LEX testing		12/31/97
12.	EDI for UNE's Documents re: Tech Specs & Bus. Rules	a) SWBT provide list of documents previously provided to MCI b) MCI to identify what info. Is missing	a) 2/20/98 b) 2/25/98	N/A	a) 2/19/98 b) At 2/22/98 meeting c-d) SWBT has dramatically changed the milestones from the milestones that Judge Siegel and the parties addressed at the workshop. At the workshop, SWBT was required to provide the missing information (business plans and technical specifications) within one week of the 2/22/98 meeting. There was no mention of a "record of understanding" or a "reciprocal review." SWBT's substitute milestones are inconsistent with Judge Siegel's rulings at the workshop and highlight the difficulties MCI faces in developing its SWBT- specific EDI capabilities.	a) 2/20/98 b) 3/19/98
13.	Electronic Ordering for additional product	Gateway development: a) parties to discuss current OBF guidelines for these	2/26 initial meeting with the Change Control Process discussions. Subsequent meetings (March time frame) to follow specifically re: LSOG 3		a) At 2/26/98 meeting. b) Discuss at 2/26/98 meeting c) Discuss at 2/26/98 meeting	All issues should have been discussed at the 2/26/98 meeting. Requests for changes should be incorporated into the change control

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
	lines (ISDN, Design Services)	products thru Special Request Process of Contract for products not yet defined by OBF & that are not available electronically to any party (incl. SWBT) a) Gateway development, through Change Control process to handle OBF capabilities that go beyond SWBT back office capability b) Parties schedule discussions re: the possibility of SWBT converting more back office functions to an electronic format at 2/26 meeting	and Version 8 plans.	a) Discuss at 2/26/98 meeting SWBT proposes use of special request process which was not discussed at the work sessions. AT&T proposes use of Change Control process as discussed at the work sessions. b) Discuss at 2/26/98 meeting		process.
14.	SWBT/MCI- Review EDI interface for compliance with EDI technical specs./Bus rules to assist testing process	a) Conduct reciprocal review MCI provide list of any inconsistencies to SWBT for review (SWBT has already completed review previously) b) Provide review results Schedule joint meeting to review list	a) 3/1/98 b) 3/15/98	Captured above in EDI schedule	a) SWBT's review begins immediately. At the workshop, the requirement was for SWBT to conduct the review of their specifications since it was SWBT, not the CLECs, who was deviating from the industry standards. No reciprocal requirement was discussed. b) SWBT provides results by 3/1/98.	a) 3/1/98 b) 3/15/98 Meeting prior to 4/8/98.
15.	Demo of systems	SWBT Request CLEC schedule demo	If AT&T and MCI are offering service to end users in Texas, they must have some systems in place. They should be required to demonstrate their user interfaces that generate and track service requests, just as SWBT has done. SWBT and CLEC depend upon the CLECs system to receive accurate orders and investigate order inaccuracies By 3/1/98 MCI/AT&T provide date that MCI/AT&T will demo their side of the OSS interfaces to support their operational readiness.	AT&T is already providing service. AT&T is willing, upon request by the Commission, to demonstrate to the commission systems which are currently in place.	MCI is already providing service in Texas. MCI can "demonstrate" its EDI capabilities that it has developed with other ILECs, although as SWBT itself has stated in the past, it is difficult to visually demonstrate EDI beyond showing a transfer of code. SWBT itself does not provide an EDI demo as part of its OSS Trials or Joint Planning and Implementation process requirements. MCI is unable to set a date for demonstrating its SWBT-specific EDI capabilities	AT&T and MCI to provide demonstrations other their interfaces during the month of May. Staff will coordinate dates at the 5/5/98 check-in.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
					since MCI has faced numerous problems in its Phase I tests with SWBT (e.g., not receiving SOC's (order confirmations) from SWBT). Any demonstration date would depend on satisfactory completion by SWBT of its EDI capabilities and, then, a reasonable development period for MCI to complete its SWBT-specific EDI capabilities.	
	Repair/ Maint					
16.	EDI Jeopardy or Loss Notification	a) SWBT provide electronic process b) SWBT provide documentation of how jeopardy & loss notification is done internally	Loss Notification is currently in a CARE report/bill notification process. This item is more appropriately categorized as an billing issue. a) Jeopardies is an OBF/TCIF issue - tentatively scheduled for Version 9 b) Jeopardies - currently on an interim basis is being provided manually by the LSC and the Loss Notification is provided through the industry standard CARE transaction that was negotiated called the Local Disconnect Report similar to what is used when an end user "hops" to another IXC for a PIC change. SWBT conversion process issues a final bill to retail end user. SWBT Retail Organization receives loss notifications by the content of "disconnect order", which is available electronically to CLECs via the SORD BU340.	a) b)SWBT must develop the capability to provide an electronic EDI jeopardy notification by 3/31/98 or as agreed to by parties per the 9/30/97 award		Functionality to be incorporated into Phase II of EDI development.
17.	MLT	Letter from SWBT concerning loops that SWBT can perform MLT testing on a retail basis & explanation manner SWBT tests these loops. (To AT&T & MCI)	2/19/98	2/19/98	Same date as SWBT's.	2/19/98
	Perform ance Meas.					
18.	Z-Test Calc.	Meeting with SWBT/MCI/AT&T/Nara prior to 3/1/98 reach agreement regarding	SWBT to meet to reach agreement regarding standard deviation via conf. call with AT&T/MCI and Nara prior to 3/1/98.	Agree with milestone	MCI agrees with meeting date. SWBT's credit retention was not discussed at workshop and is not an agreed-to milestone.	Meeting on 3/1/98 For AT&T and MCI, agreement with SWBT by 3/18/98. If no agreement,

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		standard deviation.				to be ruled upon by staff at the 5/5/98 staff check-in.
19.	Development of Report Formats for Phase 2 (MCI)	SWBT provide format used for AT&T	2/20	N/A	Same date as SWBT's.	2/20/98
	Customized Routing					
20.	Testing including Wholesale Bill	a) AT&T to begin friendly line testing b) SWBT to provide mock-up bill for LRS NRCs and end user bill c) complete testing	3/1/98 or after trunk translations issues completely resolved b) 3/11/98 c) 4/20/98 The dates provided without underlining were provided by AT&T during the workshop and agreed by SWBT to be reasonable. New entry added by SWBT to address AT&T stated concern about what billing will look like.	a) 3/1/98 b) Agree with SWBT's date. c) 4/20/98		a) 3/1/98 b) 3/11/98 c) 4/20/98
21.	Trunk Groups	a) AT&T to correct trunk group translations issues identified for them by SWBT b) SWBT must re-test to ensure trunk translation work complete c) AT&T/SWBT resolve outstanding trunk issues identified in test	a) 2/26/98 The dates provided herein were provided by AT&T during the workshop and appeared by SWBT to be reasonable. b) 2 weeks after AT&T advises trunk work complete. c) 1 week from conclusion of re-testing.	a) 2/26/98 b) Agree with SWBT's date. c) Agree with SWBT's date.		a) 2/26/98 The dates provided herein were provided by AT&T during the workshop and appeared by SWBT to be reasonable. b) 2 weeks after AT&T advises trunk work complete. c) 1 week from conclusion of re-testing.
22.	Operation / Service Orders	AT&T to decide to use CR for live operations or to use SWBT OS/DA.	90 days from 2/12/98 The dates provided without underlining were provided by AT&T during the hearing and appears by SWBT to be reasonable.	90 days from 2/12/98		90 days from 2/12/98
	Resale Issues					
23.	Aggregation of calling plans	Aggregation of toll calling plans.	Dispute Resolution Process per contract already begun between companies; resolve by 4/15/98 or initiate DR	Negotiations complete 4/1/98 Resolve or initiate DR by 4/15/98		Negotiations complete 4/1/98 Resolve or initiate DR by 4/15/98
24.	Features: allow better use of feature purchases	Aggregation of feature packages.	Dispute Resolution Process per contract already begun between companies; resolve by 4/15/98 or initiate DR	Negotiations complete 4/1/98 Resolve or initiate DR by 4/15/98		Negotiations complete 4/1/98 Resolve or initiate DR by 4/15/98

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
25.	Resale Entry	AT&T/MCI Res service to be provided by resale. AT&T/MCI Bus service to be provided by resale		A requirement that AT&T divulge market entry dates is not consistent with applicable law, it was not negotiated and was not arbitrated. However, AT&T is already providing resale service in Texas and has proposed a comprehensive EASE and EDI schedule outlined above.	These milestones are inappropriate and should be deleted. MCI is more than happy to provide a timeline for its entry into the local markets in Texas – MCI began offering facilities-based local business service in Houston, Dallas, and San Antonio in December of last year and plans to test UNE-based residential services in Texas in the spring of this year. MCI will also comply with all obligations that it has as a COA holder (which DOES NOT include providing resale service, as SWBT implies). Broad-based resale is simply not an economic option for MCI at this time.	AT&T and MCI to provide, on a least a quarterly basis beginning on 5/1/98, estimates concerning its projected interface capacity needs. After twelve months and upon request, this requirement will be reviewed.
26.	Plexar/STS Issues	Implementation of change of law provisions, as appropriate.	8/12/98; check-in with Commission re: status of these issues	8/12/98; check-in with Commission re: status of these issues	Same date as SWBT's.	8/12/98; check-in with Commission staff re: status of these issues
		Parties may request Commission review.	After check-in	After check-in	Same date as SWBT's.	After 8/12/98 staff check-in
	Billing	<i>A requirement that AT&T divulge market entry dates is not consistent with applicable law, it was not negotiated and was not arbitrated. However, AT&T is already providing resale service in Texas and has proposed a comprehensive EASE and EDI schedule outlined above.</i>				AT&T and MCI shall provide electronic interface capacity information per Issue 26.
26a	Bill data tape measuring for UNE trial & EDI	a) Develop requirement re format necessary for LEX & EDI b) SWBT provide examples of LEX/EDI formats				See: 28; 1a
	Mutual Comp Bill Format	SWBT provide internal formats at 2/17 meeting				See: 28; 1a
26b	UNEs	Begin testing with wholesale bill Meeting all day re; UNE			MCI does not want UNE billed in the Megabill format due to the lack of detail that this type	NDM process to be ready in the 4/5/98 bill cycle as well as the EDI transmission for the toll/DA

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		billing			of bill provides in the Access format. SWBT informed MCI on 12/4/97 that Feature group U (UNE) bills were not available electronically even though MCI had requested this bill format. On 12/5/97 SWBT reversed it's position stating that these bills would be available via NDM and that they would get with the project manager to start the process. On the 2/13/98 Joint order conference call SWBT informed MCI that the NDM process would not be ready until the 4/5/98 bill cycle as well as the EDI transmission for the toll/DA elements of UNE.	elements of UNE.
	Billing Records					See 27b and 29a
27	CALL FLOWS	a) Reach agreement on EMR Record Layout for UNE records b) Understand types of UNE Recordings available (orig/term) and options for receipt & application (billing, verification)	a) By 3/2/98, SWBT will provide proposed EMR/EMI record layout format(s) to AT&T and MCI. These records identify the usage extract records regarding local usage and local with access usage. Since an industry-standard format has yet to be defined, the record layout is subject to change. b) A meeting is to be held on 2/27/98 between SWBT and AT&T to review the call flows and to discuss the associated UNE recordings and details regarding the receipt and application of those recordings. c) By 4/1/98, AT&T to review EMR/EMI record layout format(s), as provided by SWBT, with Systems Development Group and determine implementation date. d) By 3/13/98, AT&T to review SWBT	a) By 3/2/98, SWBT to provide EMR Record Layout to AT&T (short and long term). b) On 2/27/98, AT&T/SWBT to hold joint meeting to explain different types of UNE recordings, method of distribution and application c) By 4/1/98, AT&T to Review EMR Record Layout with Systems Development Group and determine implementation date d) By 3/13/98, AT&T to Review SWBT explanations and determine application of records referred to item b above. e) By 4/1/98, Reach agreement on Call Flows	02/23/98. MCI to begin discussions with SWBT regarding Call Flows.	a) By 3/2/98, SWBT will provide proposed EMR/EMI record layout format(s) to AT&T and MCI. These records identify the usage extract records regarding local usage and local with access usage. Since an industry-standard format has yet to be defined, the record layout is subject to change. b) A meeting is to be held on 2/27/98 between SWBT and AT&T to review the call flows and to discuss the associated UNE recordings and details regarding the receipt and application of those recordings. c) By 4/1/98, AT&T to review EMR/EMI record layout format(s), as provided by SWBT, with Systems Development Group and

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
			<p>explanations of UNE recordings resulting from 2/27/98 meeting and determine application of records.</p> <p>e) By 4/1/98, SWBT and AT&T to reach agreement on call flows.</p>			<p>determine implementation date.</p> <p>d) By 3/13/98, AT&T to review SWBT explanations of UNE recordings resulting from 2/27/98 meeting and determine application of records.</p> <p>a) By 4/1/98, SWBT and AT&T to reach agreement on call flows.</p> <p>MCI should coordinate with the AT&T timeline</p>
28.	BILLING FORMATS					
	1. LEX/EDI Order Fields Linked to Bills	<p>a) Reach agreement on values to be used on LEX & EDI orders for ACNA that affects bill format & ordering process in production</p> <p>b) Reach agreement on values to be used on LEX & EDI orders for OCN that affects bill format & ordering process in production</p> <p>c) Reach agreement on values to be used on LEX & EDI <u>UNE</u> orders for <u>BAN</u> that affect bill format & ordering process in production</p>	<p>a) SWBT requires an ACNA value on its UNE orders. This must be a unique, exclusive, Local ACNA value to be used when ordering supported Unbundled Network Elements via LEX, EDI, and NDM/EXACT, respectively. SWBT will assign this ACNA value (via Z++) for a CLEC's consistent use, or the CLEC may obtain this value from Bellcore. SWBT business rules are being modified to support a local, Bellcore ACNA value. The ordering and billing processes will be in place by April 27, 1998 to support this modification. In the meantime, MCI and AT&T trials may continue with use of Z++ values. SWBT will also provide details on available bill media resulting from these orders and this will be provided via letter to AT&T and MCI.</p> <p>b) The industry requires state specific OCNs to identify facility based carriers (interconnection and UNE). These OCNs must be applied to the LSR when ordering unbundled elements via LEX and EDI. By 2/20/98, SWBT will provide to AT&T and MCI information on how CARE records will be passed. This will detail how many files and what</p>	<p>a) Testing Position: By 2/20/98, SWBT to provide value to be used for ACNA on order for LEX & EDI with explanation of impact on bill format for Testing Purposes.</p> <p>Production Position: ACNA (Access Customer Name Abbreviation) is a field on LSR. Bellcore has assigned the ACNA value of 'LOA' to AT&T for use on the LSR. The Bellcore definition in LSOR states the purpose for ACNA as: Identifies the LSP to which the bill is to be rendered. Contrary to industry practices, SWBT will not accept the Bellcore ACNA value and has defined its own set of ACNA values to be used by LSP's. In accordance with Industry Standards, AT&T requires the single ACNA value assigned by Bellcore and not the multiple ACNA values designated by SWBT which require additional ordering logic and system development.</p> <p>TESTING POSITION b) By 2/20/98, SWBT to provide value to be used for OCN on order for LEX & EDI and other 'operational'</p>	<p>a) Same date as AT&T's. — SWBT Has been assigning ACNAs using the Z++ system to individual LECs for internal reasons. SWBT has taken it upon themselves to assign ACNAs to LECs, and has conveyed to the LECs that for local service these new ACNAs must be used. The relationship of the ACNA to the bill is that it represents or identifies the Access Carrier's Name. In a meeting with SWBT in July 1997, SWBT informed MCI that the ACNA code of ZPR would be assigned to MCI for the interconnection trunk bills. However, it was noted on this matrix that SWBT has also informed AT&T to use ZPR as well. SWBT needs to cease in requiring MCI to use the Z++ series of codes on orders. They are not truly ACNA codes and they are not maintained in the Bellcore database. Jerry Gonzales at SWBT has agreed to accept the MCI ACNA code of WUA effective immediately.</p>	<p>SWBT/AT&T/MCI resolve issues relating to ACNA, OCN, etc. by 3/31/98. After that date any party may request, in this docket, expedited staff-level review of these issues.</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
			<p>OCN will be assigned in the UNE environment.</p> <p>c) SWBT will provide to AT&T BAN and CBA values to be used when ordering Unbundled Elements via LEX and EDI by 3/31/98.</p>	<p>applications for Testing Purposes.</p> <p>PRODUCTION POSITION CC (Company Code) aka 'OCN' is a field on LSR. NECA assigns 1 Overall Code and 1 Code for each State where a LSP does business. The Bellcore definition in LSOR states the purpose for CC as: Identifies the LSP requesting service. Contrary to industry practices, SWBT has made the decision to use the OCN to discern Resale from UNE. Therefore, SWBT requires the use of State Level OCN for UNE. In accordance with Industry Standards, AT&T requires the Overall OCN for 'operational' applications, e.g., ordering/provisioning, usage data transfer, local account maintenance, etc.</p> <p>c) By 3/31/98, SWBT to provide value to be used for BAN/CBA on order for LEX & EDI with explanation of business rules and impact on bill format for Production. AT&T will evaluate the impact on ordering and billing after receipt of SWBT's explanation of business rules.</p>	<p>b) Same date as AT&T's. MCI's use of state level OCN for LNP will only be the 7229 OCN and not individual state level OCNs because MCI plans to load SMS with only one OCN (7229). As with AT&T, MCI plans to use only one OCN with SMS and if SWBT requires state level OCNs, all orders will reject in SMS as the OCN value must match the OCN on the LSR.</p> <p>c) SWBT informed MCI during the joint test order call on 9/26/97 that the UNE bans would be billed in CABS and must be set up one per class of service and LATA. INP required that CBA's (consolidated billing arrangement) be established for the CRIS billing system even though this was an unbillable element so no bills would be generated. MCI was required to fill out and send a separate billing profile form for each BAN/CBA that would be used. MCI was told on the 10/13 joint test order conference call that The BANs take 5 business days and 7-10 business days for CBAs to be established. Orders cannot be placed until the ban setup is complete. SWBT will not begin the BAN/CBA process until a CLEC is certified to provide in a state and a signed interconnection agreement has been completed. MCI was not told during this period that toll/DA would be billed out of the CRIS</p>	

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
					<p>billing system, MCI was not required to fill out billing profiles for these CBAs and they were established by SWBT. MCI/SWB have not addressed the need for new BANs/CBAs for line splits as this does not appear applicable to our situation</p>	
	2. CABS Bill	<p>a) Reach agreement on start date for test of CABS Wholesale Bill</p> <p>b) Determine Implementation Date</p>	<p>a) By 2/27/98, SWBT will provide a detailed outline of the CABS billing processing for Unbundled Network Elements (UNE) to AT&T and MCI. This outline will include type of bill, UNE rate elements to be billed and available bill media.</p> <p>b) Implementation date will be based on the successful completion of the UNE test.</p>	<p>a) By 2/27/98, SWBT to provide billing outline for testing.</p> <p>On 2/12/98, for the first time SWBT informed AT&T that the billing for usage sensitive UNE elements will be produced as a paper CRIS bill and no mechanized version of the bill would be provided. SWBT currently sends a CRIS bill electronically to AT&T via EDI. However, SWBT states that a mechanized bill for UNE (either CABS or CRIS) will not be available until March of 1999. In order to coordinate with comprehensive UNE testing, mechanized billing for UNE's must be fully operational before the end of 1998. AT&T requires a mechanized bill in order to support production level volumes for the consumer market. The lack of mechanized billing creates a barrier to entry due</p>	<p>By 2/27/98 SWBT will provide a letter outlining items that will be billed in CABS format, and of that what can be billed in an electronic format.</p>	<p>Testing start date: 10/1/98</p> <p>Implementation date will be based on the successful completion of the UNE test.</p> <p>The Commission has previously informed the parties of its preference for BOS formatted bills, where appropriate.</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
				<p>to manually intensive process that results in higher costs and removes AT&T's ability to manipulate the data.</p> <p>b) Determination of the implementation date is dependent on a successful UNE test which includes AT&T's ability to verify the accuracy of the bill. (See AT&T's further discussion regarding billing attached to this matrix)</p>		
	3. Mutual Comp Bill	<p>a) Reach agreement on start date for test of Mutual Comp Bill</p> <p>b) Determine Implementation Date</p>	<p>SWBT will meet with AT&T to review the Mutual Compensation process as well as documentation of Mutual Compensation bill on 2/27/98. A similar meeting was previously held with AT&T concerning facilities based applications.</p> <p>Implementation will be based on the successful completion of the test.</p> <p>SWBT must have state specific Operating Company Number (OCNs) to accurately identify usage for mutual compensation.</p> <p>On 2/5/98 in an MCI/SWBT meeting, MCI agreed to provide an interim report that would identify the usage as "local" or "toll". MCI also agreed that within 120 days from the meeting, it would be able to send originating records. The parties just need to agree to the format.</p> <p>Additionally, SWBT filed a motion for clarification regarding the originating message issue, so this is not the appropriate forum to address this issue.</p>	<p>a) An all day meeting will occur on 2/27/98 where call flows, mutual compensation billing system, 9299 process and any resulting bill formats will be discussed.</p> <p>AT&T requires a mechanized bill to support production level volumes for the consumer market. (see discussion above on CABS bill and AT&T's further discussion regarding billing attached to this matrix)</p> <p>b) Determination of implementation date is dependent on a successful UNE test which includes AT&T's ability to verify the accuracy of the bill. (See AT&T's further discussion regarding billing attached to this matrix)</p>	<p>MCI requires all Mutual Compensation billing to be in CABS electronic format.</p>	<p>Start date for a mechanized mutual compensation billing format: 10/1/98.</p> <p>Implementation date will be based on the successful completion of the test.</p> <p>The Commission has previously informed the parties of its preference for BOS formatted bills, where appropriate.</p>
	4. ASBS Bill	<p>a) Reach agreement on start date for test of ASBS Bill</p> <p>b) Determine Implementation Date</p>	<p>Both AT&T and MCI are currently being billed miscellaneous charges (e.g. Usage Extract, Local Disconnect Report). AT&T and MCI can review the bills they are currently receiving and provide any questions to their SWBT Local Service Center for resolution.</p>	<p>a) On 2/17/98, SWBT provided a list of items that would be billed on ASBS bill and that the method for rendering the bill would be paper. It was also identified that a recent production bill received by AT&T was generated from the ASBS</p>	<p>MCI requires all ASBS billing to be in CABS electronic format.</p>	<p>Testing start date: 1/1/99</p> <p>Implementation date will be based on the successful completion of the test.</p> <p>The Commission has previously</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
			<p>This is not the appropriate forum to address MCI's desire to obtain CABS format. It is not a contractual obligation and it is not an arbitrated item.</p>	<p>process and therefore will be used as the bill sample.</p> <p>AT&T needs to have a mechanized bill in order to support production level volumes for the consumer market. (See discussion on CABS above and AT&T's further discussion regarding billing attached to this matrix)</p> <p>b) The determination of an implementation date is dependent on a successful UNE test which includes AT&T's ability to verify the accuracy of the bill. (See AT&T's further discussion regarding billing attached to this matrix)</p>		<p>informed the parties of its preference for BOS formatted bills, where appropriate.</p>
	5. IBIS Bill	<p>a) Reach agreement on start date for test of IBIS Bill</p> <p>b) Determine Implementation Date</p>	<p>a) A meeting is to be held on 3/6/98, between SWBT and AT&T to discuss IBIS bill formats and methods in preparation of testing, including agreement on start date of test. MCI declined inclusion in this meeting.</p> <p>b) Implementation date will be based on successful completion of the above mentioned meeting.</p> <p>SWBT's Mutual Comp process for local interconnection compensation is not done in CABS. It is "CABS-like" and has been covered in detail with both AT&T and MCI representatives on more than one occasion. Most recently, in a meeting with MCI on Feb. 5, 1998, exchange of orig. records for mutual compensation for local interconnection billing processes was discussed in detail and target dates were established by both parties to work to that end.</p> <p>This is not the appropriate forum to address MCI's desire to obtain CABS format. It is not a contractual obligation and it is not an arbitrated item.</p>	<p>a) On 3/6/98, AT&T and SWBT will meet to discuss the IBIS bill formats, elements and method for billing in preparation for test.</p> <p>AT&T requires a mechanized bill in order to support production level volumes for the consumer market. (see discussion above on CABS and AT&T's further discussion regarding billing attached to this matrix)</p> <p>b) Determination of the implementation date is dependent on a successful UNE test which includes AT&T's ability to verify the accuracy of the bill.</p>	<p>MCI requires all IBIS billing to be in CABS electronic format.</p>	<p>Testing start date: 1/1/99</p> <p>Implementation date will be based on the successful completion of the test.</p>
	6. CRIS Bill	<p>a) Reach agreement on start date for test of CRIS Bill for UNE</p>	<p>UNE trial items identified to date that will bill out of CRIS are Interim Number Portability (INP), UNE IntraLATA toll,</p>	<p>a) AT&T and SWBT will work together to agree on testing scenarios that result in CRIS</p>	<p>MCI requires all UNE billing to be in CABS electronic format.</p>	<p>Parties shall work together to agree on testing scenarios that result in CRIS billing.</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		b) Determine Implementation Date	and Directory Assistance (DA). SWBT and AT&T will meet after AT&T receives its first bill for INP, UNE intraLATA toll and Directory Assistance. Bills are expected in April or May and are dependent on orders being successfully posted. SWBT and AT&T will agree on test scenarios that will result in the billing for the aforementioned products. See SWBT's response to MCI under "SWBT development of BOS-format bill for UNE."	billing (e.g. INP). However, agreement has not been reached as to which billing formats will be used for specific products. A major disagreement still exists regarding whether the billing formats to be utilized will be mechanized. SWBT currently sends a mechanized CRIS bill to AT&T via EDI; however, SWBT plans for UNE billing via CRIS to be processed as a paper bill. b) SWBT and AT&T to meet after receipt of the CRIS bill generated from UNE test process (scheduled in Spring of 1998) in order to determine an implementation date.		Staff review status on 8/24/98. Parties may request formal staff review at the 10/1/98 check-in. The Commission has previously informed the parties of its preference for BOS formatted bills, where appropriate.
	7. CABS Bill (AT&T to SWBT)	a) Reach agreement on start date for test of CABS Bill for UNE to be rendered from AT&T to SWBT b) Determine Implementation Date	a) A meeting is to be held on 2/27/98 between SWBT and AT&T to identify the bill format as rendered to SWBT by AT&T. b) Implementation date will be based on the successful completion of testing.	a) On 2-17-98, SWBT identified Mutual Comp Group as the contact people to work with AT&T on CABS Bill exchange. AT&T and SWBT agreed to begin discussion of AT&T rendered CABS bill to SWBT at the Mutual Comp meeting set for 2/27/98. b) Determination of the implementation date is dependent on a successful UNE test. AT&T and SWBT will determine the payment process for the CABS bill.		a) A meeting is to be held on 2/27/98 between SWBT and AT&T to identify the bill format as rendered to SWBT by AT&T. a) Implementation date will be based on the successful completion of testing.
29.	MUTUAL COMP PROCESS (92-99)	a) Reach agreement on Mutual Comp Process	SWBT will meet with AT&T to review the Mutual Compensation process as well as documentation of Mutual Compensation bill on 2/27/98. A similar meeting was previously held with AT&T concerning facilities based applications. Implementation will be based on the successful completion of the test. SWBT's Mutual Comp. process for local interconnection compensation is not done in CABS. It is "CABS-like" and has been covered in detail with both AT&T and MCI representatives on more than one occasion. Most recently, in a meeting with MCI on Feb. 5, 1998, exchange of orig. records for mutual compensation for local interconnection	a) On 2/27/98, SWBT to meet with AT&T re: Billing and Mutual Compensation Process (92-99) and determine subsequent testing schedule and implementation dates as appropriate.		a) On 2/27/98, SWBT to meet with AT&T re: Billing and Mutual Compensation Process (92-99) and determine subsequent testing schedule and implementation dates as appropriate.

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
			billing processes was discussed in detail and target dates were established by both parties to work to that end.			
30	Terminating & Orig 800 Access Recordings	a) Reach agreement on details of interim methodology & interim format of the bill	<p>a) A meeting is to be held on 3/6/98 between SWBT, AT&T and MCI for methodology and format of bill in support of Originating 800 and Terminating access services.</p> <p>b) On 3/15/98, agreement is to be reached between SWBT and AT&T regarding the interim methodology and bill format.</p> <p>c) Discussion of the long-term solution will occur between SWBT, AT&T and MCI in 3rd quarter 1998.</p> <p>d) Development of test plan of the long-term solution will occur between SWBT and AT&T in December 1998.</p> <p>e) By 3/31/98, the interim solution will conclude and the long-term solution will be initiated with April 1999 billing.</p>	<p>AT&T should not be required to wait until 3/99 for SWBT to develop the capability to record terminating access and 800 originating access. Any form of averaging in the interim should not be an across-the-board average but rather, should be based on discreet averages developed for individual segments of the market (e.g., segments of the business and consumer markets).</p> <p>a) Joint meeting between AT&T and SWBT set for 3/6/98</p> <p>b) By 3/15/98, complete details of interim solution.</p> <p>c) Begin joint meetings in 3Q98 to address long term solution.</p> <p>d) By 12/98, develop test plan with SWBT for Final Solution.</p> <p>e) By 3/31/99 End Interim Solution</p>		<p>a) Joint meeting between AT&T and SWBT set for 3/6/98</p> <p>b) By 3/15/98, complete details of interim solution.</p> <p>c) Begin joint meetings in 3Q98 to address long term solution.</p> <p>d) By 12/98, develop test plan with SWBT for Final Solution.</p> <p>e) By 3/31/99 End Interim Solution</p>
31.	Items 30 and 31 were merged, so this issue is intentionally left blank.					
32.	SWBT development of BOS-format bill for resale	MCI made written request for BOS-format. MCI to insert date		N/A	MCI made request on 12/24/97.	Request made 12/24/97
		SWBT acknowledgment of MCI request	If this is a BFR, SWBT is supposed to confirm receipt w/in 10 days.	N/A		SWBT to confirm by 3/7/98
		Meeting between SWBT/MCI when MCI will identify what it wants and will pay for.		N/A		Meeting prior to 4/1/98
		BFR from MCI		N/A		Step deemed to have been met.
		SWBT development of BFR initial cost and time estimate. MCI positive response required for development of final quote. Development subject to accepted final quote.	BOS-format bill for resale development will be discussed in detail and mutually-agreeable milestones confirmed during the regularly-scheduled weekly AT&T/SWBT billing meeting on 2/17/98. MCI will also participate in the 2/17 meeting. Confirm BFR received: 10 Business Days Status Report: 30 Calendar Days	N/A		<p>Rate quote by 6/1/98 (SWBT's awareness of this request justifies reducing the rate quote date to one month following the status report.</p> <p>LSP Response by 7/1/98</p>

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
			Rate quote: 90 calendar days LSP Response: 30 Calendar days			
	Addition al Issues					
33.	White Pages	<p>a) MCI request for product/service: electronic feed of MCI customer's directory listings prior to printing of directory with Service to begin 5/98</p> <p>b) SWBT to follow procedures for FTA negotiations (<u>account managers for AT&T and MCI to confer with AT&T/MCI regarding exact nature of request</u>).</p> <p>c) SWBT provide response to request.</p>	<p>This is a new request by MCI made at the work session for the first time. SWBT has treated it as an official request for negotiation for a new service.</p> <p>a) Request by 2/12/98.</p> <p>b) Account team will coordinate</p> <p>c) MCI will be notified via their account team by 3/1/98</p> <p>d) May, 1998</p>	<p>AT&T has not yet experienced the problems that this milestone is intended to address. AT&T will monitor and cooperate with any schedules which result from this milestone.</p>	<p>MCI requested the ability to review and "double-check" its customers' directory listings before SWBT published the directory because MCI's customers' listings were disappearing prior to publication. The bottom line is that MCI wants to ensure that its Texas customers properly receive their listings in the White Pages. The Commission has the authority under the FTA to ensure that MCI's customers receive White Page listings at parity with SWBT's customers. Thus, the Commission has the authority to order SWBT to provide MCI with electronic access to the records as part of this implementation schedule. A protracted negotiation and arbitration process simply increases the likelihood that consumers' listings will be lost.</p> <p>a) Same as SWBT's.</p> <p>b) SWBT provides electronic access to listings by 5/1/98.</p> <p>c) SWBT provides response to request by 3/1/98.</p>	<p>a) Request by 2/12/98.</p> <p>b) Account team will coordinate</p> <p>c) MCI will be notified via their account team by 3/1/98</p> <p>a) May, 1998</p>
	<i>Placement of Cust- omer Guide pages in White page directories</i>	SWBT to relocate pages provided for free based on AT&T's request	5/98	a) May 1, 1998		5/1/98
34.	9-1-1	<p><u>AT&T to provide documentation regarding 9-1-1 service will be provided to its Digital Link customers (or any other customers it plans to serve from its 4ESS switches)</u></p> <p><u>AT&T to provide staffs of the State Advisory</u></p>	<p>Meeting date should be set ASAP to discuss this (possibly in connection with Project 18734). As an LSP for an end-user, AT&T is responsible for providing 9-1-1 service for that customer. The 4ESS switches are not capable of doing so.</p> <p>This is part and parcel of the implementation two-way street. AT&T's</p>	<p>AT&T has been in contact with the State Advisory Commission on Emergency Communications on this issue for a number of months. This milestone is unnecessary and unrelated to the purposes for this implementation schedule. However, if the Commission believes a date is necessary for AT&T to provide the documentation to the PUC and the SACEC, AT&T proposes</p>		4/1/98

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		Commission on Emergency Communications and PUC documentation describing the manner in which customers of its Digital Link local service will be provided access to 9-1-1 service.	unwillingness to provide this information to SWBT is suspect. Is AT&T going to provide 9-1-1 service to its digital link customer or are a digital link customer and SWBT going to have to take some action to ensure that it has 9-1-1 service?	4/1/98.		
35.	Collocation	SWBT to re-file its virtual collocation tariff and supporting cost study information	March 15, 1998	March 15, 1998 AT&T will utilize the tariff review process to raise any concerns relating to the collocation process		3/15/98
36.	Network Efficiency	a) Negotiate implementation plan for utilizing access trunks and defining the PLU b) Implementation of PLU and removal of interconnection trunks	SWBT is investigating to determine if FCC and Texas PUC have issued orders that are jurisdictional conflicts pertaining to this issue.	a) Completed March 25, 1998 b) Completed May 25, 1998		SWBT to review potential conflict immediately. Barring conflict, the following dates apply: a) Completed March 25, 1998 a) Completed May 25, 1998
37.	Dark Fiber	a) SWBT to provide M&Ps for obtaining dark fiber records b) SWBT and AT&T negotiate any changes to M&Ps c) If negotiations prove unsuccessful, file ADR	a) M&Ps are not arbitrated issue. b) M&Ps are not arbitrated issue. c) Acceptable.	a) March 15, 1998 b) April 15, 1998 c) AT&T to initiate ADR if needed.		a) March 15, 1998 b) April 15, 1998 c) AT&T to initiate ADR if needed.
38.	Route indexing Location Routing Number (LRN)	AT&T will await the testing phase and outcome of the LRN rollout in Houston and determine the need to implement route indexing at that time.	FCC Mandate states SWBT must rollout LRN in Houston by 3/31/98.	LRN (Houston) rollout to be completed March 31, 1998.		LRN (Houston) rollout to be completed March 31, 1998.
39.	EAS Additive	a) Parties to develop implementation plan for billing EAS usage sensitive additive on UNE switch ports. b) Coordinate with billing teams for billing requirements for usage sensitive billing additive associated with UNE switch ports c) Check-in already scheduled with	a) 30 days after SWBT reports design and due date requirements as indicated in item c below. SWBT must have sufficient opportunity to explore its capabilities before joining customers in discussions regarding implementation. b) 30 days after SWBT reports design and due date requirements as indicated in issue c below. SWBT must have sufficient opportunity to explore its capabilities before joining customers in discussions regarding requirements c) SWBT is willing to explore and define	a) March 1, 1998 b) April 1, 1998 c) June 19, 1998 d) September 15, 1998		a) March 1, 1998 b) April 1, 1998 c) June 19, 1998, unless SWBT's development justifies an earlier date d) Determine at check-in

	Activity	Milestone	SWBT Date/Rationale	AT&T Date/Rationale	MCI Date/Rationale	Decision
		Commission. d) Implement reciprocal EAS additive measurement	billing requirements to comply with the Commission Order to bill usage sensitive MOU charges for the EAS additive by May 1, 1998, rather than July 1998. d) Contingent on resolution of issue c above.			
40.	Intellectual Property	SWBT to provide AT&T copies of intellectual property licenses with its vendors of equipment, facilities, software, etc. and letters to or from vendors relating to confidentiality or licenses and third party access to equipment, facilities, software, etc.	SWBT has complied with this section of the parties' agreement. The issue is already the subject of appeals, and AT&T is free to pursue ADR.	March 3, 1998. AT&T believes this is required under SWBT's "best efforts" obligation in Section 7.3.2 of the Interconnection Agreement. AT&T will initiate ADR process, if necessary.		N/A SWBT argues it has complied. If AT&T disagrees, it should institute ADR proceedings.
41.	UNE Entry into Market	a) <u>Date by which AT&T/MCI Residence service provided by UNEs</u> b) <u>Date by which AT&T/MCI Business service provided by UNEs</u>	a) and b) Unless AT&T/MCI have plans to enter the market using UNEs, any request by AT&T/MCI for SWBT to meet dates for other items related to UNEs are disingenuous at the least.	A requirement that AT&T divulge market entry dates is not consistent with applicable law, it was not negotiated and was not arbitrated. In any case, entry dates are dependent on many issues which are presently unresolved, including, but definitely not limited to access to EASE to order loop and port UNE combinations.	MCI is actively developing UNE-based business and residential products for the Texas market. For example, MCI is actively preparing and testing its collocation facilities in Dallas. Moreover, MCI is actively pursuing other residential products using UNEs for the Texas market, but a production date is contingent on numerous technical factors (including SWBT's OSS readiness).	AT&T and MCI to provide target dates for UNE residential and business entry by 3/20/98.
42	Entrance Facilities					Staff-level arbitration to be coordinated with virtual collocation hearing. Staff to issue procedural schedule.
43	PIC Charges					Staff-level arbitration to be coordinated with virtual collocation hearing. Staff to issue procedural schedule.